



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 4, 2021

BY CM/ECF

The Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Enald Beqiraj, a/k/a "Aldo Beqiraj," 21 Cr. 656 (LGS)*

Dear Judge Caproni:

The Government writes, with the consent of defendant Enald Beqiraj, a/k/a "Aldo Beqiraj," to respectfully (1) propose a deadline for discovery in the above-captioned matter and (2) propose a schedule for a status update and a pretrial conference. *See* [Dkt. No. 21](#).

On or about March 24, 2021, the Government obtained a Complaint charging the defendant with two counts of wire fraud, in violation of [18 U.S.C. §§ 1343](#) and [2](#). On or about March 29, 2021, the defendant was arrested at his residence in Salem, Massachusetts. He was presented the next day and released on pretrial bail conditions. On April 20, 2021, the defendant as presented in this District and permitted to remain on release subject to the same conditions. After the parties agreed to continue the preliminary hearing deadline and indictment deadline several times, on October 27, 2021, the defendant agreed to the filing of an Information and pleaded not guilty. At the arraignment proceeding that day, Magistrate Judge Barbara C. Moses excluded time under the Speedy Trial Act until November 10, 2021.

Beginning soon after the defendant's arrest, the parties have been engaged in detailed discussions about a pretrial resolution. Pursuant to these discussions, the Government has produced certain preindictment discovery, and the parties have discussed the appropriate application of the United States Sentencing Guidelines to this case and mitigating factors relevant to the defendant. The parties discussions about a pretrial resolution are ongoing.

The Government, with the defendant's consent, respectfully requests a deadline of Monday, November 15, within which to produce discovery in this matter, which includes voluminous electronic records. Furthermore, the Government, with the defendant's consent, proposes that (1) the parties will file a joint letter on the status of their discussions by January 7, 2022, and (2) a pretrial conference be held in the first week of February 2022. The parties are available February 1, February 2, and February 3 after 12:00 p.m.

The Government further requests an order excluding time under the Speedy Trial Act from November 10, 2021, until the date of the new conference date. The ends of justice served by

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holding the conference in approximately 30 days, and excluding time through then, outweigh the best interests of the public and the defendant in a speedy trial because it will permit the parties additional time to continue their discussions about a pretrial resolution to this matter and conserve judicial resources. *See* 18 U.S.C. § 3161(h)(7)(A). The defendant consents to this request.

Respectfully submitted,

DAMIAN WILLIAMS
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Southern District of New York

By: 
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Cc: Counsel for the defendant (via CM/ECF)

Application Granted in part. Rule 16 discovery shall be completed by **November 15, 2021**. The parties shall file a joint status letter regarding the status of any discussions about a pretrial resolution by **January 7, 2022**. The parties shall appear for a status conference on **February 8, 2022, at 10:30 a.m.** Defendant's motion(s), if any, shall be filed by **February 14, 2022**. The Government's response, if any, shall be filed by **March 7, 2022**. Defendant's reply, if any, shall be filed by **March 18, 2022**. For the reasons stated above, the Court finds that the ends of justice served by excluding the time between today and February 8, 2022, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. 3161(h)(7)(A). It is hereby ORDERED that the time between today and February 8, 2022, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 22.

Dated: November 15, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE